

**IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY MARYLAND**

SUSAN WILLIAMS  
3721 Barclay Road  
Marydel, Maryland 21649

Plaintiff

v.

Case No. CA 21-12618

DOLGENCORP, LLC  
d/b/a DOLLAR GENERAL  
100 Mission Ridge  
Goodlettsville, TN 37070  
SERVE ON: Resident Agent  
CSC-Lawyers Incorporating Service Company  
7 St. Paul Street  
Baltimore, Maryland 21202

Defendants

CLERK OF THE  
CIRCUIT COURT  
2021 OCT 14 AM 9:21  
PR GEO CO MD #57

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**COMPLAINT AND JURY DEMAND**

COMES NOW, the Plaintiff Susan Williams, by and through undersigned counsel, and files this Complaint against Defendant Dolgencorp, LLC, d/b/a Dollar General and states:

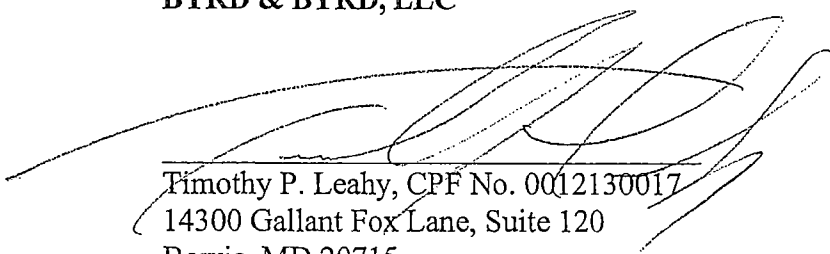
1. On or about February 4, 2019, the Plaintiff entered the Dollar General in Denton, Maryland.
2. On or about February 4, 2019, the Plaintiff was standing in line at the register on a mat that had not been on the floor on her previous trips to the store, she was loading the items into her shopping cart behind her and to her left.
3. As she began to head out, pushing her cart, the mat, which was not commercial grade and suitable for commercial premises, rolled up and caused the Plaintiff to trip and fall.
4. Plaintiff landed on her left side, causing her severe, and permanent injuries, including shattering her left wrist, chronic pain, limited mobility & a 21% permanent-partial impairment of her left upper extremity & 13% impairment to her whole person.

5. Defendant had a duty of care to the Plaintiff to ensure that the areas customers would be walking, and operating Defendant's shopping carts, were safe which included placement of a commercially appropriate, commercial-grade, mat with non-slip backing to ensure the safety and avoid injury to the Plaintiff.
6. The Defendant breached its duty of care by failing to properly place a safe mat.
7. As a direct and proximate cause of Defendant's failure to properly place a safe mat, the Plaintiff was injured and suffered serious, and permanent injuries including, but not limited to, a shattered wrist and broken arm, past, present, and future medical expenses, mental anguish, and severe physical pain and suffering.

**WHEREFORE**, Plaintiff respectfully requests that a judgment be entered against the Defendant Dollar General in compensation for the injuries she suffered due to Defendant's negligence and in an amount in excess of 75,000.00.

Respectfully submitted,

**BYRD & BYRD, LLC**



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**JURY DEMAND**

The Plaintiff hereby requests a trial by jury on all matters herein.



Timothy P. Leahy, Esq.